

RSS:RSS

AO 91 (Rev. 11/11) Criminal Complaint

UNITED STATES DISTRICT COURT

for the

District of Minnesota

UNITED STATES OF AMERICA

v.

MICHAEL BENJAMIN THOMPSON

**FILED UNDER SEAL PURSUANT TO
LR 49.1(c)(1)(G) AND 18 U.S.C. § 3509(d)(2)**

Case No. 25-mj-247 ECW

CRIMINAL COMPLAINT

I, the undersigned complainant, being duly sworn, state the following is true and correct to the best of my knowledge and belief.

Production and Attempted Production of Child Pornography: On or about January 30, 2025, in Hennepin County, in the State and District of Minnesota, the defendant

attempted to and did employ, use, persuade, induce, and entice Minor Victim 1 to engage in sexually explicit conduct for the purpose of producing a visual depiction of such conduct, which visual depiction was produced and transmitted using materials that had been mailed, shipped, and transported in interstate and foreign commerce, and which visual depiction was actually transported and transmitted using a means and facility of interstate and foreign commerce, and in and affecting interstate and foreign commerce, namely, a video with file name VAEA2AB16-2DA7-4771-97F1-C3BD6D910992.MP4, all in violation of Title 18, United States Code, Sections 2251(a) and 2251(e).

I further state that I am an FBI Special Agent and that this complaint is based on the following facts:

SEE ATTACHED AFFIDAVIT

Continued on the attached sheet and made a part hereof: ☒ Yes ☐ No

SUBSCRIBED and SWORN before me
by reliable electronic means via (FaceTime/Zoom and
email) pursuant to Fed. R. Crim. P. 4.1.

Date: April 28, 2025

City and State: St. Paul, MN


Complainant's signature

Jacquelyn Kvilhaug, Special Agent, FBI
Printed name and title


Judge's Signature

Elizabeth Cowan Wright, United States Magistrate Judge
Printed Name and Title